

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

<b>WYTERIA SIMS,</b>	)	
<b>INDIVIDUALLY, AND O/B/O</b>	)	
<b>THE ESTATE OF MARCUS</b>	)	<b>CIVIL ACTION FILE NO.</b>
<b>SIMS,</b>	)	
	)	<b>1:22-cv-01696-VMC</b>
<b>PLAINTIFF,</b>	)	
	)	
<b>v.</b>	)	
	)	
<b>WINGATE MANAGEMENT</b>	)	
<b>COMPANY, LLC,</b>	)	
	)	
<b>DEFENDANT.</b>	)	

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

<b>KEIONTAY DAVIS,</b>	)	
	)	
<b>PLAINTIFF,</b>	)	<b>CIVIL ACTION FILE NO.</b>
	)	
<b>v.</b>	)	<b>1:22-cv-01692-VMC</b>
	)	
<b>WINGATE MANAGEMENT</b>	)	
<b>COMPANY, LLC,</b>	)	
	)	
<b>DEFENDANT.</b>	)	

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

<b>KENNETH LONG,</b>	)	
	)	
<b>PLAINTIFF,</b>	)	<b>CIVIL ACTION FILE NO.</b>
	)	
<b>v.</b>	)	<b>1:22-cv-01693-VMC</b>
	)	
<b>WINGATE MANAGEMENT</b>	)	
<b>COMPANY, LLC,</b>	)	
	)	
<b>DEFENDANT.</b>	)	

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

<b>DEMARIO NEWTON,</b>	)	
	)	
<b>PLAINTIFF,</b>	)	<b>CIVIL ACTION FILE NO.</b>
	)	
<b>v.</b>	)	<b>1:22-cv-01694-VMC</b>
	)	
<b>WINGATE MANAGEMENT</b>	)	
<b>COMPANY, LLC,</b>	)	
	)	
<b>DEFENDANT.</b>	)	

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

<b>RICKY PHILLIPS,</b>	)	
	)	
<b>PLAINTIFF,</b>	)	<b>CIVIL ACTION FILE NO.</b>
	)	
<b>v.</b>	)	<b>1:22-cv-01695-VMC</b>
	)	
<b>WINGATE MANAGEMENT</b>	)	
<b>COMPANY, LLC,</b>	)	
	)	
<b>DEFENDANT.</b>	)	

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**DEFENDANT’S DISCLOSURE OF EXPERT WITNESS**  
**PURSUANT TO FED. R. CIV. P. 26(a)(2)(A) and (B)**

COMES NOW Defendant Wingate Management Company, LLC (“Wingate”) and hereby identifies Jon D. Groussman, J.D. as an expert witness who may testify at trial to present evidence under Rules 702, 703, or 705 of the Federal Rules of Evidence. Wingate attaches hereto the expert report of Mr. Groussman pursuant to Fed. R. Civ. P. 26(a)(2)(B).

This 29th day of April, 2024.

**SWIFT, CURRIE, McGHEE & HIERS, LLP**

By: /s/ **Lauren D. Woodrick**  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that I have this day served a copy of the within and foregoing **Defendant's Disclosure of Expert Witness** upon all parties to this matter via electronic service to all counsel of record as follows:

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This 29th day of April, 2024.

**SWIFT, CURRIE, MCGHEE & HIERS, LLP**

By: /s/ **Lauren D. Woodrick**  
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